

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Administrative Motion to Consider Whether Google's Materials Should Be Sealed regarding Plaintiffs' Opposition to Google's Motion to Strike (Dkt. 744) ("Motion"). Having considered the Motion and supporting declarations, and good cause having been found, the Court **ORDERS** as follows:

Document	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Plaintiffs' Opposition to Google's Motion to Strike	GRANTED as to redacted portions at: Page 3:13-15, 9:24-26, 10:12, 12:9-10, 13:1-4, 13:6-8, 14:6-7, 14:11-24, 15:1-3, 15:6-14, 15:18-27, 16:25-27	The information requested to be sealed contain descriptions of privileged communications and information protected by the attorney-client privilege and work product doctrines, including summaries of communications from Google non-attorney employees regarding a regulatory investigation. Dkts. 733-2, -3. Google gave notice to Plaintiffs of the inadvertently produced document subject to the attorney-client privilege and work product protection on August 26, 2022. Dkt. 733-1. Google has filed a motion to strike certain references to these materials in Plaintiffs' prior briefings and in their opposition (Dkt. 733). The information requested to be sealed at page 16, line 27 also contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and

		proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 1 to Mao Declaration - Google Privilege Log 004	GRANTED as to redacted portions at: Pages 1-4, "Title" column	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, project code names, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge